

Pursuant to 37 CFR 1.121(c)(1), please replace the current versions of claims 31 and 33 with the following clean copies of claims 31 and 33. Also, please add the following new claims 48-60:

A1
31. (Once Amended) A method comprising:

analyzing a plurality of accounts having a common account holder, wherein at least one of the plurality of accounts is associated with a first financial institution and at least one of the plurality of accounts is associated with a second financial institution;

determining whether an adjustment of funds among the plurality of accounts would benefit the account holder; and

transferring funds between the plurality of accounts if such a transfer would benefit the account holder.

A2
33. (Once Amended) A method as recited in claim 31 wherein transferring funds includes transferring funds from a first account at the first financial institution to a second account at the second financial institution.

A3
48. (New) A method comprising:

initiating a transfer of funds from a first account at a first financial institution to a second account at a second financial institution, wherein the transfer of funds is performed using an Automated Clearing House network; and

wherein the first account and the second account have a common account holder.

49. (New) A method as recited in claim 48 wherein the first account and the second account are asset accounts.

50. (New) A method as recited in claim 48 wherein the transfer of funds is effectuated using a debit instruction and a credit instruction.

51. (New) A method comprising:

Q3 initiating a withdrawal of funds from a first account at a first financial institution, wherein an instruction for the withdrawal of funds is initiated by an entity other than the first financial institution; and

initiating a deposit of the withdrawn funds to a second account at a second financial institution.

52. (New) The method as recited in claim 51 wherein the first account and the second account are asset accounts.

53. (New) The method as recited in claim 51 wherein the deposit of withdrawn funds utilizes an ATM network.

54. (New) The method as recited in claim 1 wherein the second account is a new account being funded by assets from the first account.

55. (New) The method as recited in claim 22 wherein the second registered account is a new account being funded by assets from the first registered account.

56. (New) A method comprising:
opening a new account at a first financial institution;
identifying a second account at a second financial institution; and
initiating a transfer of funds from the second account to the new account,
wherein the new account and the second account have a common account holder.

57. (New) A method as recited in claim 56 wherein the transfer of funds from the second account to the new account utilizes an Automated Clearing House network.

58. (New) A method as recited in claim 56 wherein the transfer of funds from the second account to the new account utilizes a payment processor.

59. (New) A method as recited in claim 56 wherein the transfer of funds from the second account to the new account issues a debit instruction associated with the second account and a credit instruction associated with the new account.

60. (New) A method as recited in claim 56 wherein the new account is an asset account.